



Wisconsin Electric POWER COMPANY
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February 2, 1983

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO IE INSPECTION REPORT
NOS. 50-266/82-21 AND 50-301/82-21
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Pursuant to the provisions of 10 CFR 2.201, provided herewith is Licensee's response to those items of noncompliance identified in NRC IE Inspection Report Nos. 50-266/82-21 and 50-301/82-21 dated January 3, 1983. Both these items involved apparent failures to operate the plant in accordance with approved procedures.

The first item in the Notice of Violation concerned two separate incidents. The first incident involved a procedure being conducted in accordance with OP-3C, "Hot Shutdown to Cold Shutdown", on October 25, 1982. This procedure, ICP 10.7 (which was classified as neither Major nor Minor), required the plant to be in cold shutdown ($<200^{\circ}\text{F}$) as a prerequisite in contrast to OP-3C which required the temperature to be greater than 395°F (+5, -0) for the performance of ICP 10.7. This inconsistency was discussed in the control room at the time the procedure was being conducted by the Duty Shift Supervisor and the Duty & Call Superintendent. Both agreed that procedure ICP 10.7 had not been changed since the Point Beach Nuclear Plant Unit 1 heatup limitation curves, Technical Specification Figure 15.3.1-1, had been revised.

This revision would not permit the desired pressure test to be conducted at the cold shutdown temperature (200°F). Procedure ICP 10.7 was field changed in accordance with Point Beach Nuclear

Plant Technical Specification 15.6.8.3.B, which states "All temporary or permanent changes to other minor procedures under the jurisdiction of Maintenance, I&C, Reactor Engineering, or Chemistry & Health Physics shall be approved by a supervisor of the cognizant group and shall be subsequently reviewed and approved by the group head of the cognizant group." The cognizant group head is the Superintendent - I&C. The position is presently vacant but the Superintendent - Technical Services (who was the Duty & Call Superintendent) had been the Superintendent - I&C until July 1, 1982 when he was promoted. He could be considered the "cognizant group head". He reviewed and approved the conduct of ICP 10.7, with the corrected prerequisite temperature, after discussion with the Duty Shift Supervisor. On October 26, 1982 ICP 10.7 was permanently revised and classified as a "minor" procedure to preclude recurrence of this procedural noncompliance. Given the nature of the described instance, the procedural non-compliance may be more accurately defined as a procedural nonclassification.

The second incident of the first violation involved procedure RP-1C, "Refueling", which states in Step 4.8 "An audible signal output from a plant source range channel is operable and will indicate count rate and change in count rate both in the control room and in containment." On November 4, 1982 an absence of the audible count rate was noted. The timer unit on the count rate system was set for a 16-second interval when it should have been set for a 60-second interval. The unit uses this gated time interval to accumulate source rate count data to generate the audible signal. Currently, in accordance with procedure RP-1C, the audible count rate signal is verified on a daily basis during refueling. A revision to data form RE-10 of RP-1C to include a check of the proper operation of the audible count rate signal every eight hours during fuel or source motion is being made to increase the frequency of positive verification of the audible signal. Due to the effect of fuel motion (or source motion) in the vicinity of source range detectors, the timer unit gated time interval must be changed periodically to ensure that the audible count rate signal properly represents the actual count rate. To aid in precluding improper time unit settings on the audible count rate system in the future, a precaution is being added to RP-1C to warn personnel of the effect of fuel or source motion in the vicinity of a source range detector on the audible count rate signal timer unit accumulation interval. Full compliance for these corrective actions will take place prior to the Unit 2 Refueling 9 outage scheduled to commence March 25, 1983.

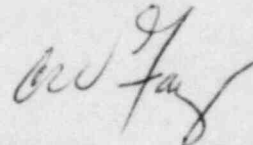
Mr. J. G. Keppler

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The second violation involves the use of the watch turnover log. On October 5, 1982 manual isolation valve GS-3 was shut, but was not noted on the watch turnover logs. When the Unit 2 gas stripper unit was operated with this valve shut, portions of the chemical and volume control system were pressurized high enough to create leakage from the body-to-bonnet joint of several three-inch Grinnel diaphragm valves into the auxiliary building. An Operations night order book entry was made on October 8, 1982 to remind all operators of the importance of proper and complete communications, especially where plant conditions are involved. It was also stressed that accurate up-to-date maintenance of the status board and watch turnover log is essential to safe, effective control of a nuclear steam producing plant. A quality assurance review of the procedures concerning maintenance of the watch turnover log was also conducted. The procedures were found to be both adequate and complete.

Very truly yours,



Vice President - Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector